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13
14 IN THE UNITED STATES DISTRICT COURT

15 EASTERN DISTRICT OF CALIFORNIA

16
17 CAROLE S. TALAN

No. 2:05-CV-00109-FCD-PAN

18 Plaintiff,

JOINT STIPULATION, REQUEST
AND ORDER TO EXTEND TIME
FOR EXPERT DISCLOSURE

19 vs.

20
21 METROPOLITAN LIFE INSURANCE
COMPANY,

Complaint Filed: January 19, 2005

Trial Date: September 19, 2006

22
23 Defendant.

24
25 _____ /
26 TO THE COURT AND ALL PARTIES OF RECORD:

27 Counsel for plaintiff Carole S. Talan and counsel for defendant Metropolitan Life
28

1 Insurance Company, having met and conferred regarding the expert disclosure, hereby stipulate
2 and request as follows:

3 Plaintiff and defendant have been engaged in settlement negotiations for several months
4 and both sides have expectations that this matter may soon settle. In addition, plaintiff's counsel
5 underwent a total hip replacement on November 28, 2005, which interrupted his normal work
6 schedule.

7 For the foregoing reasons, IT IS HEREBY STIPULATED THAT the pretrial order be
8 amended with respect to the time of expert disclosure and completion of experts as follows:

9 All counsel shall designate in writing and file with the court the names of all experts they
10 propose to tender at trial on or before March 6, 2006. All supplemental designations shall be
11 made on or before March 27, 2006.

12 It is so agreed and stipulated.

13 Dated: January 6, 2006

deVRIES LAW FIRM

15 By: /s/ Douglas K. deVries
16 DOUGLAS K. deVRIES
Attorney for Plaintiff

17 Dated: January 6, 2006

SEYFARTH SHAW

19 By: /s/ Lawrence E. Butler
LAWRENCE E. BUTLER
Attorneys for Defendant

21 **IT IS SO ORDERED:**

22 Dated: January 6, 2006

23 By: /s/ Frank C. Damrell Jr.
FRANK C. DAMRELL, Jr.
United States District Judge